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The Clerk shall file the following under seal,
ECF No. 266, 267, 269, and 273, limiting
viewing to the attorneys for the parties and to
Chambers personnel.

January 11, 2024

SO ORDERED.

VIA ECF

Hon. Alvin K. Hellerstein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Dated: 1/12/24
New York, New York

/s/ Alvin K. Hellerstein

Alvin K. Hellerstein
United States District Judge

**Re: *The Avon Company f/k/a New Avon LLC et al. v. Fareva Morton Grove, Inc. et al.*, Case
No. 22-cv-4724**

Dear Judge Hellerstein:

We represent Plaintiffs The Avon Company f/k/a New Avon LLC and LG H&H Co., Ltd. f/k/a LG Household & Health Care, Ltd. (collectively, "Avon") in the above-referenced matter. We write to respectfully request that the Court enter an Order to maintain under seal the documents discussed below, copies of which are being contemporaneously filed under seal pursuant to the Court's standing order, 19-mc-00583, and this Court's Individual Rule 4(B)(ii). In support of this Letter Motion, Avon states as follows:

On October 7, 2022, the Court entered a Stipulated Confidentiality Agreement and Protective Order (the "Protective Order"). (ECF No. 65.) The Protective Order permits either party to designate Discovery Material as "Confidential" or "Attorney's Eyes Only," and provides that information so designated may not be disclosed except as expressly permitted under the Protective Order. (ECF No. 65 at ¶¶ 2, 12.)

On December 21, 2023, the Court issued an Order directing each party to "submit briefing on the issue of termination for cause versus for convenience[.]" (ECF No. 262.) Accordingly, Avon is submitting a Motion for Partial Summary Judgment Concerning Fareva's Early Termination of the MSA "For Convenience" (the "Motion"), a Statement of Undisputed Material Facts in support of Plaintiff's Motion (the "Statement of Facts"), and the Declaration of Robert I. Steiner ("Steiner Declaration") in support thereof.

Avon intends to submit the following documents as Exhibits to the Steiner Declaration:

1. An email produced by Fareva in this action bearing Bates numbers FMG_00359385 – FMG_00359390, which Fareva designated as "Confidential" (Ex. 1);

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2. An email produced by Fareva in this action bearing Bates numbers FMG_00131481 – FMG_00131484, which Fareva designated as “Confidential” (Ex. 2);
3. An email produced by Fareva in this action bearing Bates numbers FMG_00140574 – FMG_00140575, which Fareva designated as “Attorneys’ Eyes Only” (Ex. 3);
4. An email produced by Fareva in this action bearing Bates numbers FMG_00131269 – FMG_00131271, which Fareva designated as “Attorneys’ Eyes Only” (Ex. 4);
5. A letter produced by Fareva in this action bearing Bates number FMG_00006435, which Fareva designated as “Confidential” (Ex. 6);
6. A letter produced by Fareva in this action bearing Bates numbers FMG_00247543 – FMG_00247544, which Fareva designated as “Confidential” (Ex. 7);
7. A letter produced by Fareva in this action bearing Bates numbers FMG_00006472 – FMG_00006473, which Fareva designated as “Confidential” (Ex. 8);
8. A letter produced by Fareva in this action bearing Bates numbers FMG_00007050 – FMG_00007051, which Fareva designated as “Confidential” (Ex. 9);
9. A letter produced by Fareva in this action bearing Bates number FMG_00007033, which Fareva designated as “Confidential” (Ex. 10);
10. A letter produced by Fareva in this action bearing Bates numbers FMG_00007029 – FMG_00007031, which Fareva designated as “Confidential” (Ex. 11);
11. A letter produced by Fareva in this action bearing Bates numbers FMG_00146905 – FMG_00146906, which Fareva designated as “Confidential” (Ex. 12);
12. A letter produced by Fareva in this action bearing Bates numbers FMG_00006829 – FMG_00006830, which Fareva designated as “Confidential” (Ex. 13); and
13. A letter produced by Fareva in this action bearing Bates numbers FMG_00448429 – FMG_00448430, which Fareva designated as “Confidential” (Ex. 14).

Avon respectfully requests that the Court maintain under seal the above-referenced exhibits, as well as any portions of the Motion and Statement of Facts referencing or quoting those exhibits, subject to any contrary request by Fareva at any time. Additionally, Avon respectfully requests that the Court maintain under seal any portions of the Motion and Statement of Facts that reference or quote exhibits that were previously filed under seal.

By making this sealing request, Avon is not contending that good cause exists to designate any of the foregoing materials as Confidential within the meaning of the Protective Order. Instead, Avon merely

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seeks to comply with its obligations under the Protective Order to file under seal documents that Fareva has designated as Confidential. With Fareva's permission, Avon is prepared to re-file the foregoing documents or portions thereof publicly.

Thank you in advance for your consideration of this request.

Respectfully submitted,

/s/ Robert I. Steiner
Robert I. Steiner

cc: All Counsel of Record (via ECF)